

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Bradford J. Sandler
Paul J. Labov
Colin R. Robinson
PACHULSKI STANG ZIEHL & JONES LLP
780 Third Avenue, 34th Floor
New York, NY 10017
Telephone: (212) 561-7700
Facsimile: (212) 561-7777
Counsel to the Plan Administrator

In Re:

BED BATH & BEYOND INC., et al.

Case No.: 23-13359 (VFP)

Adv. Pro. No.: _____

Chapter: 11

Subchapter V: Yes No

Hearing Date: January 9, 2024

Judge: Vincent Papalia

ADJOURNMENT REQUEST

1. I, Colin R. Robinson,

am the attorney for: Plan Administrator,
 am self-represented,

and request an adjournment of the following hearing for the reason set forth below.

Matter: *Debtors' (I) Omnibus Objection to Certain Tax Claims and (II) Motion to Determine Tax Tax Liability and Stay Proceedings* [Docket No. 2156] and *Debtors' (I) Second Omnibus Objection to Certain Tax Claims and (II) Motion to Determine Tax Liability and Stay Proceedings* [Docket No. 2180] (collectively, the "Tax Claim Objections").

Current hearing date and time: January 9, 2024 at 10:00 a.m.

New date requested: February 14, 2024 at 10:00 a.m.

Reason for adjournment request: The Plan Administrator has negotiated approximately 19 resolutions with various Texas and California counties. In discussions with the Texas Taxing Authorities (the “TTA”), who represent all remaining Texas Counties, the parties have agreed to adjourn the hearing on the Tax Claim Objections for thirty (30) days in an effort to resolve any remaining disputes and if necessary, establish a briefing schedule for the Court to determine legal issues at the next scheduled hearing. Moreover, the TTA has requested that its motion to compel payment of remaining 2022 Ad Valorem Taxes be adjourned until the next hearing date. No other party has indicated to the Plan Administrator’s counsel that they intend to move forward on January 9, 2024, or have an objection to an adjournment of the Tax Claims Objections.

2. Consent to adjournment:

I have the consent of all parties. I do not have the consent of all parties (explain below):

As set forth above, no party has indicated that they intend to move forward
on January 9, 2024 or object to an adjournment of the Tax Claims Objections.

I certify under penalty of perjury that the foregoing is true.

Date: January 5, 2024

/s/ Colin R. Robinson
Signature

COURT USE ONLY:

The request for adjournment is:

<input checked="" type="checkbox"/> Granted	New hearing date: <u>February 14, 2024 at 10am</u>	<input type="checkbox"/> Peremptory
<input type="checkbox"/> Granted over objection(s)	New hearing date: _____	<input type="checkbox"/> Peremptory
<input type="checkbox"/> Denied		

**IMPORTANT: If your request is granted, you must notify interested parties
who are not electronic filers of the new hearing date.**